

EXHIBIT 23

DECLARATION OF DENISE DAVIS

Denise Davis declares, under penalty of perjury and pursuant to 28 U.S.C. § 1746:

1. My name is Denise Davis. I am 58 years old. I live in Phelps County, Missouri.
2. I am a cancer survivor, and I am currently struggling with problems with my kidneys, as well as PTSD and depression.
3. I used to work at a publishing company in sales and advertising, but the company went out of business, so I lost my job in September 2022. My health had been getting progressively worse since February 2022, and my doctor noticed that my kidneys were not doing well. By December 2022, I was hospitalized for two weeks because I was in acute kidney failure. Because of my poor health, I have not been able to work since October 2022.
4. I now have no source of income and no savings. I owe over \$100,000 in medical bills that I need to make regular payments towards.
5. I have had to live in a friend's house for the past four months because I had nowhere else to stay. I receive mail at my friend's address. Because I feel uncomfortable relying on a friend's kindness to this extent, I submitted an application for public housing this week.
6. I have never received food stamps (SNAP) before. After I got sick, lost my job, and lost my home, I needed help. I have tried to apply for SNAP three separate times. The application process was new to me at first, but I feel like I've had to become an expert. I still have not been able to get approved for SNAP.
7. I am now entirely reliant on charity in order to receive food. The hospital told me to get connected with local churches in Saint James. The churches provide food on the third Thursday of each month. They have provided me most of my food since I was released from the

hospital. I also visited the Dream Center in Rolla once. They provided me with a week's worth of food.

8. The food I have been given is mostly processed food. My doctor told me that it is important for me to maintain a healthy diet to help protect my kidneys. I am not getting the fruit and vegetables that I need from the donated food.

9. In late 2022, I applied for SNAP for the first time by online application. Because I hadn't heard anything after I applied, I called the general Department of Social Services (DSS) SNAP information line, and I was able to speak to a DSS staff person. She told me there was no application registered under my Social Security number, so I would have to reapply.

10. In December 2022, I applied for SNAP for a second time, using the online application. After I applied, I was hospitalized for two weeks because of my kidney problems. I did not have my phone with me at the hospital. Once I was released, I tried to call the call center's SNAP interview line. I called DSS's call center almost daily, and each time there were 300 or 400 people ahead of me in line. Some days there would be over 700 people ahead of me. I tried calling at 6 AM and 7 AM to see if timing made a difference, but I was never able to get through.

11. Several times, after waiting on hold for 2-3 hours, I reached a point in the line where there were fewer than 100 people in front of me, but then I was told that DSS was receiving too many calls, and the phone system cut me off and a recorded message told me to call back later. I noticed the system would never let me stay on hold for more than 3 hours. My friend tried calling DSS on her phone to help me, since she is on a contract whereas I use a prepaid phone. We were both cut off after around three hours. I would typically get cut off after I had waited long enough to be around the 50th or 75th person in line.

12. In early January 2023, I received a letter from DSS stating that I needed to complete an interview in order for my December application to be processed. A true and correct copy of that letter is attached as Exhibit A to this declaration.

13. Shortly afterwards, I received a notice in the mail warning me that if I did not complete an interview by January 30, my SNAP application would be denied. A true and correct copy of that notice is attached as Exhibit B to this declaration.

14. One morning in January, around five weeks ago, I received a call from DSS, and I picked up, but I was put on hold and told there were 17 people in front of me. Eventually I was able to speak to a staff person who asked what my case number was. I didn't have it on hand, so I gave her my Social Security number. She said this was okay, but then she hung up on me. I called the number back immediately and I was told there were 300 people ahead of me in line. This instance was especially frustrating for me because I have been sleeping with my phone right beside me on full volume in case I receive an early morning interview call, and after finally speaking to a representative I was still unable to complete the interview.

15. After several attempts to reach DSS over the phone, I called my local DSS office in Rolla, MO, to set up an appointment for an in-person interview, because I could not get an interview through the call center. Instead of being able to talk to anyone at my local office, I was automatically transferred to the call center and put on hold again. I have no transportation, so I could not easily visit the Rolla office in-person. I got the impression there was no one in the office. I tried calling four separate times and never reached anyone.

16. After calling my local DSS office, I went on the DSS website, and I saw there was an option to use an online chat feature to ask about your case. I tried to use the chat to speak with a representative and see if I could be interviewed via chat, but it seems like it's just artificial

intelligence (AI). I tried speaking to the AI chat system twice to try to figure out what to do since I could not complete an interview. Each time the AI directed me to call the call center.

17. I was never able to complete the eligibility interview by the January 30 deadline mentioned on the final notice, so my SNAP application was rejected.

18. On or around January 30, Melanie Hickcox at Feeding Missouri helped me submit another online application for SNAP. I have tried to reach the call center around 15 times since then, but I still was not able to speak to anyone.

19. In early February, I received a letter from DSS stating that I needed to complete an interview in order for my application to be processed. A true and correct copy of that letter is attached as Exhibit C to this declaration.

20. A few days later, I received a notice in the mail warning me that if I did not complete an interview by March 1, my SNAP application would be denied. A true and correct copy of that notice is attached as Exhibit D to this declaration.

21. Despite many attempts over several months, I still have not been able to speak to anyone to complete an interview.

22. DSS has two phone numbers for SNAP calls. One is a general information number and one is for interviews. Both phone numbers have similar wait times.

23. I have worked in a customer service call center before. There, we could see who had been holding the longest. It seems like DSS doesn't care about that.

24. Unlike at other call centers, I have not been given the option to leave my number for DSS to call back.

25. I feel sorry for seniors and people who are really sick. I am sure so many people must have given up on getting food stamps.

26. I need to be able to buy food for my survival and my health. I have no way of buying food without food stamps.

Dated: February 28, 2023
Saint James, Missouri

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Document History

SignNow E-Signature Audit Log

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Document name: Updated Davis draft
Document created: 02/28/2023 21:53:10
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Document Sent: 02/28/2023 23:05:26 UTC
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Sender: lbcalandro@lsem.org
Signers: guest_signer_762552636632@no.reply
CC:

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SignNow Web Application	Document Saved	lbcalandro@lsem.org	02/28/2023 21:54:13 pm UTC	02/28/2023 21:54:13 pm UTC	68.251.251.28
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